

Marie Huber  
Project Manager  
USACE – Jacksonville District  
August 8, 2019

Dear Marie:

Thank you for the opportunity to comment on the Draft Project Management Plan (PMP) for Phase 2 of the Biscayne Bay Coastal Wetlands (BBCW) Comprehensive Everglades Restoration Plan (CERP) Project. This important project is the only CERP Project to directly benefit Biscayne Bay and Biscayne National Park (BNP). I am a resident of Miami-Dade County and its boating community. I have a long history of working on the BBCW Project before my retirement from government service.

#### GENERAL COMMENTS ON DRAFT BBCW PHASE 2 PROJECT MANAGEMENT PLAN

##### Background

The BBCW Project was divided into two phases. The reason given was the complexity associated with fulfilling the primary objective of Phase 2, identifying additional clean freshwater to restore the appropriate salinity year-round in Biscayne Bay and BNP. Phase 2 identifies and analyses options or combinations of options to provide this additional freshwater to Biscayne Bay and BNP.

Resolutions were passed in 2016 and 2017 by Miami-Dade County and its major municipalities, including Village of Palmetto Bay, Village of Pinecrest, Town of Cutler Bay, City of South Miami, City of Miami, City of Coral Gables, Surfside, Village of Key Biscayne, and City of Miami Beach urging the U.S. Army Corps of Engineers (USACE), the Florida Department of Environmental Protection (FDEP), and the South Florida Water Management District (SFWMD) to take all steps necessary to expedite the planning of Phase 2 of the BBCW Project so that such planning occurs as soon as possible and prior to the then scheduled start date of 2021.

Federico E. Fernandez, Esq., Chairman, SFWMD Governing Board, sent a letter in January 2019 to the Honorable R.D. James, Assistant Secretary of the Army Civil Works, requesting funds be reallocated to develop a PMP and Scope of Study for the Phase 2 of the BBCW Project. The January 2019 letter states that the additional freshwater to be provided in Phase 2 is crucial to the health of Biscayne Bay and the federal resource, BNP.

In July 2019, Drew Bartlett, Executive Director, SFWMD, sent a letter to Colonel Andrew Kelly, District Commander-Jacksonville District, USACE, requesting that the USACE allocate funds to begin the BBCW Phase 2 planning. The July letter further states that the SFWMD proposes to begin planning for the C-111 Spreader Canal Eastern (C-111 SCE) in concert with or as a part of BBCW Phase 2. It is unclear at this time how this will proceed so I have not included the spreader in my specific comments below.

##### The Draft PMP

Given that identifying additional freshwater is crucial for both the BBCW Phase 2 and for the effective functioning of C-111 SCE, the PMP must clearly include as its primary objective identifying and analyzing options or combinations of options to provide additional freshwater to the bay from both within and outside the basin . Potential options identified are bringing seepage and runoff water from the Regional System, use of Aquifer Storage Recovery, use of reservoirs, and use of treated wastewater. This additional freshwater must be provided -for ecosystem restoration of Biscayne Bay and to BNP.

The C-103 Canal provides water directly into BNP. The PMP should consider the potential need to expand the conveyance capacity of one or more of the regional canals (C-1, C-100, C-102, and C-103) in order to convey more water coastward from the L-31N canal so that any additional water from the regional system could potentially be utilized by the BBCW Phase 2 Project without exacerbating flooding concerns. Some of the locations where canal improvements may be needed are located outside the current BBCW Study Area. Therefore, the BBCW Phase 2 Study Area should be expanded. There continues to be a need to focus primarily on the BBCW wetland area between the C-1 and the C-103 Canals.

If it is determined that the addition of an eastern spreader canal will not delay the progress of BBCW Phase 2, the eastern spreader canal could be added to the BBCW Phase 2 Project and the C-111 SCE Project abandoned.

#### SPECIFIC COMMENTS ON DRAFT BBCW PHASE 2 PROJECT MANAGEMENT PLAN

Based on the General Comments above I've made some suggested edits.

##### Section 2.2, Page 17

1. Revise the second paragraph as follows:

*The study will address identifying options for providing additional freshwater to Biscayne Bay and Biscayne National Park to improve year round salinity regimes in Biscayne Bay and Biscayne National Park as well as addressing ecosystem restoration in locations south of the authorized BBCW Project and expanding the study area to include canal conveyance in the C-1, C-100, C-102 and C-103 canals. The study will also address ecosystem restoration in lands south of the North Canal, Model Lands, Card Sound, and additional locations in Biscayne Bay.*

2. Revise the third paragraph as follows:

*Objectives for the BBCW2:*

1. *Restore and improve quantity, quality, timing and distribution of freshwater to the Bay, including Biscayne National Park to ensure appropriate year-round salinity by identifying additional sources of freshwater, analyzing options for additional sources, and implementing the preferred options.*
2. *Restore nearshore and saltwater wetland salinity regimes.*
3. *Ensure adequate canal conveyance in the C-1, C-100, C-102, and C-103 Canals to implement the preferred options.*
4. *Redistribute freshwater flow to minimize point source discharges to improve freshwater and estuarine habitat.*
5. *Preserve and restore spatial extent of natural coastal glades habitat.*

6. *Reestablish productive nursery habitat along the shoreline.*
7. *Reestablish connectivity between Biscayne coastal wetlands, C-111 Basin, Model Lands, and adjacent basins.*
3. Revise the fourth paragraph to include an additional bullet:
  - *Independent restoration studies, existing and future storage facilities and capabilities, and refined regional modeling*

Please contact me with any questions regarding the above. I do not plan to submit a “hard copy” unless requested.

Sincerely,

Joan Lawrence  
413 Viscaya Avenue  
Coral Gables, Florida 33134  
tessie01313@gmail.com